

RECEIVED
IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
MINOR BOERNSTEDT DIVISION

DONALD And MARY THORNTON,

Plaintiffs,

vs.

ROLLIN VAUGHN SOWARDS; And
PROGRESSIVE INSURANCE CO.,

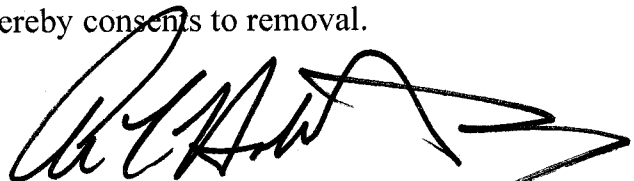
Defendants.

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CASE NO.: 2:06cv1072-MHT

JOINDER IN NOTICE OF REMOVAL

COMES NOW the Defendant named in the Complaint as Progressive Insurance Company and hereby joins in the notice of removal filed by Defendant Rollin Vaughn Sowards, and consents to same. This Defendant is a corporation incorporated under the laws of the State of Ohio, with its principal place of business in Ohio, thus a citizen of the State of Ohio. Diversity of Citizenship exists in this case. Furthermore, the requisite amount is in controversy in light of the fact that Plaintiffs seek underinsured motorist coverage from Progressive Insurance Company, which would be over and above liability limits applicable to the co-defendant, creating a claim in excess of \$75,000.00. This Defendant adopts the notice of removal and hereby consents to removal.



ALEX L. HOLTSFORD, JR. (HOL048)
Attorney For Defendant Progressive Specialty
Insurance Company

OF COUNSEL:
NIX HOLTSFORD GILLILAND
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CERTIFICATE OF SERVICE

I hereby certify that I have this day mailed, postage prepaid, an exact copy of the foregoing document to:

Richard E. Crum
COBB, SHEALY, CRUM, DERRICK
& PIKE, P.A.
Post Office Box 6346
Dothan, Alabama 36302-6346

William B. Alverson, Jr.
ALBRITTONS, CLIFTON, ALVERSON
MOODY & BOWDEN, P.C.
Post Office Box 880
Andalusia, Alabama 36420

This the 30th day of November, 2006.

A handwritten signature in black ink, appearing to be 'R. E. Crum', is written over a horizontal line.

OF COUNSEL